

Exhibit 24

In The Matter Of:
Darcy Corbitt, Destiny Clark, and Jane Doe v.
Hal Taylor, etc., et al.

Diane Woodruff
November 8, 2018

Baker Realtime Worldwide Court Reporting & Video
250 Commerce Street
Third Floor, Suite One
Montgomery, Alabama 36104
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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF ALABAMA
3 NORTHERN DIVISION

5 CIVIL ACTION NO.: 2:18-CV-00091-MHT-GMB

7 DARCY CORBITT, DESTINY CLARK, and JANE DOE,

8 | Plaintiffs,

9 | v.

10 HAL TAYLOR, in his official capacity as
11 Secretary of the Alabama Law Enforcement
12 Agency, et al.

13 Defendants.

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15 DEPOSITION OF DIANE WOODRUFF

16 | November 8, 2018

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18 Taken before Elaine Scott, CCR,
19 Commissioner for the State of Alabama at
20 Large, in the Law Offices of the Alabama
21 Attorney General, 501 Washington Avenue,
22 Montgomery, Alabama, on Thursday, November 8,
23 2018, commencing at approximately 12:55 p.m.

1 A P P E A R A N C E S

2

3 FOR THE PLAINTIFFS:

4 AMERICAN CIVIL LIBERTIES UNION FOUNDATION

5 Gabriel Arkles

6 125 Broad Street

7 18th Floor

8 New York, New York 10004

9

10 ALABAMA CIVIL LIBERTIES UNION FOUNDATION

11 Brock Boone

12 Randall C. Marshall

13 P.O. Box 6179

14 Montgomery, Alabama 36106

15

16 FOR THE DEFENDANTS:

17 OFFICE OF THE ATTORNEY GENERAL, STATE OF

18 ALABAMA

19 Brad A. Chynoweth

20 501 Washington Avenue

21 Montgomery, Alabama 36130

22

23

1 A P P E A R A N C E S (continued)

2

3 ALSO PRESENT:

4 **Meredith Barnes**

5

6 COURT REPORTER:

7 BAKER REALTIME WORLDWIDE REPORTING & VIDEO

8 250 Commerce Street

9 *Third Floor, Suite One*

10 **Montgomery, Alabama 36104**

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1 had -- if they had surgery then they would be
2 able to get a letter from the physician.

3 Q. What about people who don't have
4 surgery?

5 A. Actually at that time when I was
6 working in the medical unit I didn't have that
7 many that didn't -- there were some I guess
8 that came up. Basically if you didn't have
9 the surgery we couldn't change the sex.

10 Q. What did you think about that?

11 MR. CHYNOWETH: Object to the form.

12 A. Well, following guidelines, you
13 know, which is what we have to do, I can't
14 really have an opinion. You know, this is
15 just what we have to do, you know, you don't
16 need the guidelines or what we've set forth,
17 so --

18 Q. You're still human, I guess. Okay.

19 A. Well, you would know. Yeah. And
20 I'm very compassionate to people.

21 Q. Did anyone ever complain?

22 A. Yeah, I'm sure they did. I can't
23 list -- I can't name anybody in particular,

1 but I'm sure they did.

2 Q. Do you remember anyone being upset
3 or were they sad?

4 A. Uh-huh, I remember talking to some
5 sad people.

6 Q. How did that make you feel?

7 MR. CHYNOWETH: Object to the form.

8 A. Obviously compassion for them.

9 Q. You felt bad?

10 A. Right. Just like anybody we
11 can't -- we can't help, you know.

12 Q. I understand. Do you know what --
13 what problem were they trying to address with
14 the procedure?

15 A. As far as -- most of the time
16 they -- if I'm answering -- if I'm
17 understanding the question correctly, they
18 just had -- maybe they would say they had gone
19 through part of the whole procedure, like
20 maybe they had lived as a different sex, you
21 know, for a certain amount of time or whatever
22 but they just hadn't gone to the surgery part,
23 and so -- and I've been living like this for,

1 what documentation must they present?

2 A. A state certified birth certificate
3 and a Social Security card and proof of
4 address. And then if any name change they
5 would need to have a name change document.

6 Q. And that's when they apply for the
7 first time?

8 A. Yes, sir.

9 Q. Is there anything else?

10 A. Well, if they're fifteen to
11 eighteen years of age they'll need to provide
12 school proof. Now, if they're not a U.S.
13 citizen then they would need their immigration
14 documents. They can also present a valid U.S.
15 passport.

16 Q. If someone wants to trade in an
17 out-of-state license for an Alabama license,
18 what documentation must they present?

19 A. Their out-of-state driver's license
20 and their state certified birth certificate
21 and then any name change document and proof of
22 address or the -- anything on our authorized
23 presence list but, yes, that's the meat and

1 the potatoes.

2 Q. When people first apply for a
3 driver's license in Alabama, does anyone ever
4 ask them from ALEA down if they are
5 transgender?

6 A. No, sir.

7 Q. Would you agree that if a
8 transgender person applying for an Alabama
9 license for the first time presented
10 documentation only reflecting the sex with
11 which they identify and not the sex they were
12 assigned at birth they would receive an
13 Alabama license with a sex designation that
14 matched the sex designation on their other
15 documents?

16 MR. CHYNOWETH: Object to the
17 form.

18 MR. BOONE: How come? I just want
19 to make sure I'm -- can you answer the
20 question?

21 A. Can you repeat it cause it's kind
22 of long?

23 Q. It's long. If someone -- if

1 someone is -- if the only documents that the
2 DMV sees are documents of the sex that they
3 identify with, would they receive an Alabama
4 license with that sex designation?

5 A. Are we talking about a birth
6 certificate?

7 Q. Yes.

8 A. If they had a birth certificate --

9 Q. Or --

10 A. -- then that's the sex that we're
11 going to use on the birth certificate.

12 Q. Are birth certificates always
13 required to get an Alabama license?

14 A. You could bring your passport or
15 your immigration documents.

16 Q. So if someone brings in a
17 passport --

18 A. Uh-huh.

19 Q. -- and it states female, what's the
20 designation that's going to be put on their
21 license?

22 A. It would be female if we don't have
23 anything to the -- you know, if you present

1 two documents that are different, you know,
2 just like if you came in and your name was
3 John Smith on one document and John Jones on
4 the other document, we operate on a paper
5 trail documentation. So what brought it from
6 John Smith to John Jones, the document that
7 changed it? But if you brought in a passport
8 that said female, your Social Security card,
9 and your proof of address, then that's what
10 would be put on your driver's license.

11 Q. Okay. What if there is a
12 contradiction? What if, for example, someone
13 has one sex on their passport, one sex on
14 their Social Security card? What would you do
15 in that situation?

16 A. Well the Social Security doesn't
17 have a sex on it, so --

18 Q. Okay.

19 A. But if they --

20 Q. Is there another -- can you give me
21 an example of a contradictory situation?

22 A. Let's say that they had a birth
23 certificate and their out-of-state driver's